

PETER SZANTO 949-887-2369  
11 Shore Pine  
Newport Beach CA 92657

**United States Bankruptcy Court**

**in and for the District of OREGON**

1001 SW 5<sup>th</sup> Av., Portland OR 97204

CLERK U.S. BANKRUPTCY COURT

SEP 24 2018

LODGED \_\_\_\_\_ REC'D \_\_\_\_\_  
PAID \_\_\_\_\_ DOCKETED \_\_\_\_\_

**In Re Peter Szanto, Debtor**

**ADVERSARIAL 18-ap-3022-pcm**

core case # 16 -bk-33185 pcm7

**MOTION to QUASH SUBPOENA**

**to Capitol One Bank and**

**REQUEST for HEARING**

(This application is further evidence of Trustee  
McClurg's improper actions, un-cooperative  
behavior and intentional violations of  
11 USC § 704)

(Federal Rule of Bankruptcy Procedure 9016 and  
Federal Rule of Civil Procedure 45)

**May it please this Honorable Court.**

16- 33185 /18-ap-3022

Motion to Quash Subpoena - pg. 1

1  
2 **1. Defendant's Certification Relating to Pre-filing Conferral**  
3 **(Certification Pursuant to LBR 7007-1(a))**  
4

5 Ms McClurg sent debtor a prospective letter to the effect -- that for  
6 all time -- irregardless of whatever relief debtor requests, she will oppose it.

7  
8 Nonetheless, on 9-17-18, debtor phoned Ms McClurg seeking to  
9 discuss the instant application for relief.

10  
11 As of the signing of the instant paper, debtor has received no  
12 communication from Ms McClurg.

13  
14 Thus, pursuant to rule, debtor has sought conferral so as to  
15 resolve the situation, but has been unsuccessful in that regard.

16  
17 I certify under penalty of perjury under the laws of the United States,  
18 that foregoing is true and correct. Signed at Los Angeles CA.

19  
20 DATED 9-21-2018 \_\_\_\_\_/s/  Peter Szanto  
21

22 **2. Introduction**

23 **a. General Theme of Objection to 67 Subpoenas Received on 9/17/18**

24 **Debtor received 67 subpoenas from Carla McClurg on 9/17/18!!!!**  
25

1  
2 Many of the subpoenas were duplications, with absolutely no  
3 difference; just the same subpoena sent multiple times. For a while, debtor  
4 was unable to figure why Ms Mc Clurg would have issued so many, many  
5 duplicate subpoenas. Quickly, recalling all of the rules violations already  
6 committed, realization of further and continuing violations of rules and  
7 procedure was understood by debtor!!

8  
9 It is immediately clear why Ms McClurg sent such an outrageous  
10 number of subpoenas: 1<sup>st</sup>, Mc Clurg reckons that such an outrageous  
11 number of subpoenas will keep debtor occupied from pursuing work to  
12 exit his current state of destitution and (**MUCH MORE IMPORTANTLY**)  
13 2<sup>nd</sup>, McClurg knows that by sending multiple subpoenas to large  
14 institutions, it is likely that (EG, of the eight subpoenas directed to  
15 American Express, that eight different clerks will be handling each of the  
16 subpoenas -- and likely one or more of those clerks will be unaware of  
17 any Motion to Quash. Thus, irrespective of the instant Motion to Quash,  
18 materials will be sent to Mc Clurg in contravention of law. A nice payoff to  
19 rule violation which McClurg can lay-off on mistake, inadvertence or  
20 excusable neglect, irrespective of her sinister and mendacious intentions.)

21 Thus, debtor is objecting to each and every one of the subpoenas  
22 issued and seeking their complete quashing in their entirety; **with**  
23 **prejudice.**

1  
2 **b. Law of Subpoenas Has Been Violated !!!!**  
3

4 Comes now Peter Szanto, the debtor requesting relief in this Court  
5 pursuant to Federal Rule of Bankruptcy Procedure 9016 and Federal Rule  
6 of Civil Procedure 45 (FRCP 45) such that this Court will immediately  
7 ORDER the quashing of the Subpoena which has been issued to Capitol  
8 One Bank in regard of debtor / petitioner herein [EXHIBIT A].  
9

10 Previously, this Court has denied debtor's subpoena quashing  
11 motions on the theory that debtor must be transparent and all information  
12 must be supplied – **EVEN IF DUE PROCESS, NECESSARY NOTICE and**  
13 **ALL RIGHTS TO PRIVACY – CONSTITUTIONALLY GUARANTEED ---**  
14 **ARE TRAMPLED, MADE MEANINGLESS AND ERADICATED IN THE**  
15 **COURSE OF THIS ACTION !!!**

16 However, this Court's theory is at variance with all of the foundational  
17 principles of the *U.S. Constitution* which mandate adequate notice and an  
18 opportunity to be heard at a meaningful hearing before rights are impaired.  
19 *Mullane v. Central Hanover Bank* (1950) 339 US 306. In this Court, a  
20 multitude of times debtor's rights have been impaired, made meaningless  
21 and liquidated without notice and without any opportunity by debtor to be  
22 heard at any meaningful time. There is no basis for this same paradigm of  
23 blatant unfairness to be applied to subpoenas which have been issued by  
24 the trustee in crass defiance and intentional violation of FRCP 45.  
25

1  
2 In the present motion, the issues which are brought to this Court  
3 center around lack of ALL notice to debtor regarding subpoenas for which  
4 there is no evidence that they were ever served on the persons, entities  
5 and parties which are the subject of subpoenas in the instant action (due  
6 process violations).

7  
8 Here, debtor concerns himself with the specific issue of a  
9 subpoena directed to Capitol One Bank [EXHIBIT A].

10  
11 However, expeditiously, debtor will make further and additional  
12 motions as to the U.S. Trustee intentionally disregarding the duties of  
13 the trustee by failing to serve debtor with other subpoenas which  
14 sought information about debtor and his family which were, likewise,  
15 never served!

### 16 17 3. FACTS and MEMORANDUM

18 On September 17, 2018, debtor received [EXHIBIT A]: a subpoena  
19 directed to CAPITOL ONE BANK.

20  
21 That subpoena is accompanied by only a blank proof of  
22 service!!

23  
24 As shown on [EXHIBIT A-3], the proof of service is blank. The rule  
25 which is clearly stated in FRCP 45(a)(4) is:

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1  
2 "Notice to Other Parties Before Service. If the subpoena  
3 commands the production of documents, electronically stored  
4 information, or tangible things or the inspection of premises  
5 before trial, then before it is served on the person to whom it  
6 is directed, a notice and a copy of the subpoena must be served  
on each party."

7 As evidenced by [EXHIBIT A-3], there is no indication that the  
8 subpoena was ever served on anyone!! Therefore, as matters of both fact  
9 and law, Ms Mc Clurg, the issuer of the subpoena, intentionally and  
10 clearly violated the law that is FRCP 45 by failing to serve said  
11 subpoena on debtor (who is, most definitely, a party to this action).  
12 The trustee neither abided nor respected the FRCP 45 law that the  
13 subpoena "must be served on each party."

14  
15 Service of a subpoena is the act which brings a non-party within the  
16 jurisdiction of a court. *Monteiro v. San Nicolas* (1958) 254 F.2d 514. Here  
17 there is absolutely no evidence of any such service on Capitol One Bank.  
18 Thus, there is no valid service which has been demonstrated to be  
19 effected upon Capitol One Bank so as to command Capitol One Bank to  
20 do anything. And so, there is, as yet no valid jurisdiction by this Court over  
21 Capitol One Bank.

22 Similarly, the blank proof of service very clearly demonstrates, also,  
23 that no service on the entity indicated on [EXHIBIT A-2] ever occurred.  
24 This obvious and wholly intentional failure to act in conformance with

1  
2 the FRCP 45 statute is in complete and direct defiance of the last part of  
3 FRCP 45(a)(4) which mandates that "a notice and a copy of the subpoena  
4 must be served on each party."

5  
6 **Here the party who was not served with subpoena as required**  
7 **by law is debtor Peter Szanto. Failed service is also evidenced by the**  
8 **fact that the entity identified on the subpoena was not served either!**

9  
10 The evidence is absolutely clear in this instance that Ms Mc Clurg,  
11 the U.S. trustee, purposefully violated the FRCP 45 law by failing to cause  
12 service of [EXHIBIT A] subpoena as mandated by law.

13  
14 It is true that Ms Mc Clurg has complete and absolute governmental  
15 immunity from all of her violations of law – and failure to follow the rules  
16 is not a matter for which she is ever accountable. Nonetheless the  
17 subpoena fails to be valid so long as adequate service is lacking.

18  
19 **a. U.S. Trustee's Purposeful Violations**  
20 **of Law are Now Absolutely Clear**  
21

22 After discovering that there had not been service as required by law,  
23 debtor attempted to contact Ms Mc Clurg, but Ms Mc Clurg returned none  
24 of debtor's requests for conferral.

1  
2 Ms McClurg's failure to communicate as to this issue is tacit  
3 admission that the failed service was intentional and undertaken for  
4 purposes of deceit upon the debtor and this Court.  
5

6  
7 **b. Fundamental Harm and Burden to Debtor**

8 "[S]ervice of process is the vehicle through which a court can properly  
9 exercise its adjudicatory power over an individual or entity in a particular  
10 case." *Cruisephone, Inc. v. Cruise Ships Catering & Servs., N.V. (In re*  
11 *Cruisephone, Inc.)*, (2002) 278 B.R. 325, 332. Presently, this Court is  
12 deprived of its right to exercise judicial power over Capitol One Bank,  
13 because the requisite service on debtor Szanto has likewise not occurred  
14 so as to make service on Capitol One Bank valid.  
15

16 The harm and injury to debtor Szanto are the continuation and  
17 compounding of trustee McClurg's improper clandestine efforts to secure  
18 information about Szanto through methods which are not disclosed and  
19 about which Szanto is not provided any notice whatsoever!!!  
20

21 **c. Grounds to Quash Subpoena**

22 Now that the errors of law and procedure have been identified, this  
23 Court's power and jurisdiction to quash the attached subpoena derive from  
24 FRCP 45(d)(3) (**remembering that debtor Szanto is a party herein**):  
25



1  
2  
3 (A) When Required. On timely<sup>1</sup> motion, the court for the district  
4 where compliance is required must quash or modify a subpoena  
5 that: . . . . OR

6 (iv) subjects a person to undue burden.”

7 Here, the impossible, very terrible and undue burden to which debtor  
8 Szanto is being intentionally subjected are the trustee’s improper attempts  
9 to acquire personal and private information about debtor Szanto with  
10 neither adequate notice nor due process of law. This has happened –  
11 not just in the present circumstance, but also in many previous instances --  
12 wherein Szanto has received neither sufficient nor adequate notice and  
13 where the process due of actual service was wholly and completely  
14 disregarded.

15  
16 THE UNDUE BURDEN IS THE FACT SZANTO’S RIGHTS OF  
17 NOTICE AND DUE PROCESS OF LAW HAVE BEEN DISREGARDED  
18 AND MADE TOTALLY MEANINGLESS.

19  
20 LIKEWISE SZANTO HAS BEEN BURDENED BY THE TRUSTEE’S  
21 IMPROPER ACTIONS WHOSE VERY CLEAR INTENTIONS ARE  
22 NEITHER EQUANIMITY NOR JUSTICE, BUT RATHER ACQUISITION

23 ***1. This application is timely because it is made prior to the 10-***  
24 ***5-2018 date of improperly requested performance.***

1  
2 OF INFORMATION BY ANY MEANS, WITHOUT DUE PROCESS OF  
3 LAW!!

4  
5 Thereupon, FRCP 45(d)(3)'s mandatory provisions are invoked  
6 so as to require that this Court quash the [EXHIBIT A] subpoena, with  
7 prejudice.

8  
9 4. Declaration of Peter Szanto

- 10  
11 a. My name is Peter Szanto, I am over 21 years of age.
- 12  
13 b. I am the debtor in Chapter 7 Bankruptcy case 16-33185 in the  
14 the District of Oregon.
- 15  
16 c. This is my truthful declaration in support of quashing the  
17 subpoena which is [EXHIBIT A].
- 18  
19 d. There is no proof of service that I have been served with the  
20 subpoena which is [EXHIBIT A].
- 21  
22 e. There is no proof of service that Capitol One Bank has been  
23 served with the subpoena which is [EXHIBIT A].
- 24  
25

1  
2 f. I contacted Ms Mc Clurg about the failure to serve the  
3 subpoena.

4  
5 g. Ms Mc Clurg did not return my calls.

6  
7 h. It is an improper and unfair burden on me to be deprived of  
8 the necessity of service to Capitol One Bank that is required by  
9 law.

10  
11 I declare under penalty of perjury under the laws of the  
12 United States that the foregoing is true and correct. Signed at Los Angeles  
13 California.

14  
15  
16 22 September 2018



Peter Szanto

17  
18  
19 **5. Conclusion**

20  
21 For the reasons elaborated herein, there is ample good  
22 cause for the mandatory quashing of the defective subpoena [EXHIBIT A];  
23 which is defective because of lack of notice and lack of service which  
24 create undue burdens on debtor Szanto's essential and fundamental rights  
25 in this action.

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1  
2  
3 If however, this Court in unconvinced, Szanto would pray  
4 opportunity for further briefing and oral argument at an evidentiary hearing.  
5

6  
7 Respectfully,

8  
9 Dated 9/22/18  Peter Szanto  
10

11 **PROOF OF SERVICE**

12 My name is Maquisha Reynolds, I am over 21 years of age and not a  
13 party to the within action. My business address is PO Box 14894, Irvine  
14 CA 92623. On the date indicated below, I personally served the within:  
15

16 Motion upon:

17 Office of the US Trustee  
18 620 SW Main St. # 213  
19 Portland OR 97205

20 by mailing copies to the above parties *via* 1<sup>st</sup> class mail, postage  
21 prepaid, or by e-mail.

22 I declare under penalty of perjury under the laws of the United States  
23 that the foregoing is true and correct. Signed at Irvine CA.

24 Dated 9-22-2018 /s/  Maquisha Reynolds  
25



U.S. Department of Justice

Office of the United States Trustee

District of Oregon

620 SW Main St., Rm 213  
Portland, Oregon 97205

Main (503) 326-4000  
Fax (503) 326-7658

Email: [carla.mcclurg@usdoj.gov](mailto:carla.mcclurg@usdoj.gov)

Direct Dial: (503) 326-7659

September 12, 2018

Capital One Bank (USA), N.A.  
c/o Corporation Service Company  
1127 Broadway St. NE, STE 310  
Salem, OR 97301

Re: *United States Trustee v. Szanto*, Dist. Or. Adversary No. 18-3022-pcm  
Subpoena for production of documents

Dear Sir/Madam,

Attached please find a subpoena issued in connection with the the above-referenced Adversary Proceeding requiring the production of documents by **October 5, 2018**.

This subpoena requests credit card records pertaining to Peter Szanto, aka Peter Szantos (please call for SSN) whose last known addresses are: 11 Shore Pine Dr., Newport Beach, CA 92657; PO Box 14894, Irvine, CA 92623; and P.O. Box 4614, Portland, OR 97208.

**Please make production by Federal Express or other overnight delivery service to the Office of the United States Trustee, 620 SW Main Street, Suite 213, Portland, OR 97205.**

In addition, we respectfully request that you include a business records declaration. Attached is a declaration for your custodian of record's signature. If you anticipate a problem meeting the compliance date or have any questions about the scope of the subpoena, please contact me at the phone number noted above. Thank you for your assistance in this matter.

Very truly yours,

GREGORY M. GARVIN  
Acting United States Trustee for Region 18

  
CARLA GOWEN McCLURG  
Trial Attorney

cc: Peter Szanto, Debtor

Enclosures: Subpoena; Declaration of Custodian of Records

A-1

# UNITED STATES BANKRUPTCY COURT

District of Oregon

In re Peter Szanto

Debtor

Case No. 16-33185-pcm7

(Complete if issued in an adversary proceeding)

Chapter 7

United States Trustee

Plaintiff

Adv. Proc. No. 18-3022-pcm

v.

Peter Szanto

Defendant

## SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A BANKRUPTCY CASE (OR ADVERSARY PROCEEDING)

To: Capital One Bank (USA), N.A.

(Name of person to whom the subpoena is directed)

☒ **Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: All documents described on the attached Exhibit A

PLACE Office of the U.S. Trustee, 620 SW Main St., RM 213. Portland, OR 97205	DATE AND TIME 10/05/18 5:00 pm
--	-----------------------------------

### SEE COVER LETTER

☐ **Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

PLACE	DATE AND TIME
-------	---------------

The following provisions of Fed. R. Civ. P. 45, made applicable in bankruptcy cases by Fed. R. Bankr. P. 9016, are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and 45(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 09/12/18

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, email address, and telephone number of the attorney representing (name of party) United States Trustee, who issues or requests this subpoena, are: Carla Gowen McClurg, OSB #165144  
Office of the U.S. Trustee, 620 SW Main St, Rm 213, Portland, OR 97205 carla.mcclurg@usdoj.gov (503) 326-7659

### Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

**PROOF OF SERVICE**

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (name of individual and title, if any): \_\_\_\_\_  
on (date) \_\_\_\_\_.

☒ I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_  
\_\_\_\_\_ on (date) \_\_\_\_\_; or

☐ I returned the subpoena unexecuted because: \_\_\_\_\_  
\_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_.

I declare under penalty of perjury that this information is true and correct.

Date: \_\_\_\_\_

\_\_\_\_\_  
Server's signature

\_\_\_\_\_  
Printed name and title

\_\_\_\_\_  
Server's address

Additional information concerning attempted service, etc.:

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**Federal Rule of Civil Procedure 45(c), (d), (e), and (g) (Effective 12/1/13)**  
**(made applicable in bankruptcy cases by Rule 9016, Federal Rules of Bankruptcy Procedure)**

**(c) Place of compliance.**

(1) *For a Trial, Hearing, or Deposition.* A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) *For Other Discovery.* A subpoena may command:

- (A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises, at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) *Claiming Privilege or Protection.*

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) *Contempt.* The court for the district where compliance is required — and also, after a motion is transferred, the issuing court — may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.



***In re Peter Szanto, Dist. Or. Bankruptcy Case No. 16-33185-pcm11***

**Exhibit A to Subpoena dated September 12, 2018**

**Issued to Capital One Bank (USA), N.A**

Unless otherwise specified, these requests are limited to materials created and/or modified at any time between January 1, 2016 and the date of your response. This request pertains to all accounts held in the name of Peter Szanto, aka Peter Szantos. If there are no documents in your possession, custody, or control that are responsive to a request for production, please state that fact in your response. Please produce no later than October 5, 2018 the following documents whether in paper or electronic form:

1. Credit card statements for all accounts held in the name of the above-named individual.
2. Documentation of all payments made on all credit card accounts described above, including without limitation cancelled checks, ACH authorizations, transfer authorizations, and electronic debits.
3. All records concerning communications, including without limitation log notes and email, between Capital One Bank (USA), N.A. and the above-named individual or anyone acting on his behalf.
4. All documentation pertaining to the opening of all accounts described above, including dates that precede January 1, 2016; such documents covered by this request include but are not limited to credit applications in electronic and written forms.
5. All documentation pertaining to the closing of any accounts described above, including without limitation written communications.

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ORIGIN ID: DTHA  
SZANTO  
SZANTO  
P.O. BOX 14894

(949) 887-2369

IRVINE, CA 92623  
UNITED STATES US

SHIP DATE: 22SEP18  
ACTWGT: 0.50 LBS  
CAD: 112243018/NET4040

BILL SENDER

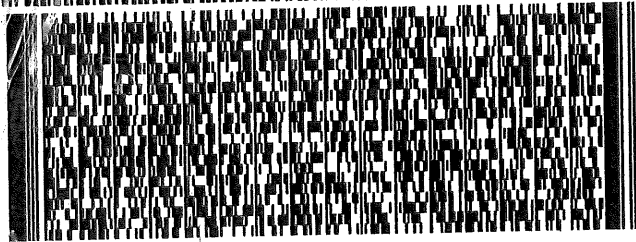
TO CLERK-DIST OREGON  
US BANKRUPTCY COURT PORTLAND  
1001 SW 5TH AVE #700  
ROOM 700 @ 1001 SW 5TH AV  
PORTLAND OR 97204

(949) 887-2369

REF:

INV:  
PO:

DEPT:



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FedEx

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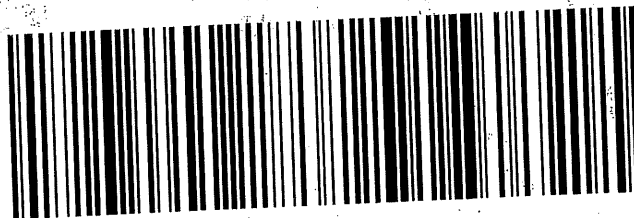
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OR-US PDX



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Case 18-03022-pcm

Doc 73

Filed 09/24/18

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